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September 14, 2018

BY ECF

The Honorable Steven I. Locke
United States Magistrate Judge
100 Federal Plaza
Central Islip, New York 11722

Re: *Bobby Hayes v. County of Nassau, et al.*, 15 CV 398 (JFB)(SIL)

Dear Magistrate Judge Locke:

As the Court may be aware from my recent filing (ECF Doc. 42), I have been retained to take over the prosecution of the above-referenced civil rights action. I write with defense counsel's consent to request that the scheduling order be extended to permit the undersigned to get up to speed with plaintiff's file, and for counsel to cooperatively schedule and complete outstanding party and non-party depositions sought by the parties.

Given the nature of the file, and in light of my prior litigation commitments over the coming weeks including, but not limited to, 2 jury trials in the Southern District scheduled in October, we respectfully request that the deadline to complete fact discovery be extended to December 31, 2018.

If the Court were inclined to grant this request, we would request a corresponding adjournment of the status conference scheduled for October 4, 2018 at 10:30 a.m. to a date after the close of fact discovery that is convenient for the Court.

Thank you for your consideration.

Respectfully,

s/ Brett Klein

Brett H. Klein

cc: Richard Femia, Esq. (by ECF)